

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION  
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON  
CORPORATION, ROBERT I. ADLER, JOHN  
DOES 1 THROUGH 5, and JANE DOES 1  
THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANTS CCBN.COM AND THE THOMSON  
CORPORATION'S MOTION TO IMPOUND THEIR MOTION TO COMPEL  
SHAREHOLDER.COM TO PRODUCE THEIR  
ARCHIVAL COPIES OF THE SHAREHOLDER MANAGEMENT SYSTEM**

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson")  
(collectively, "Defendants") submit this Motion to Impound their Motion to Compel  
Shareholder.com to Produce Their Archival Copies of the Shareholder Management System  
("Motion to Compel"). Impoundment is necessary because the Motion to Compel contains  
references to, and attaches copies of, documents produced by Defendants that have been  
designated as "Confidential" and "Highly Confidential" under the terms of the Stipulated  
Protective Order (attached as Exhibit A).

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON  
CORPORATION,

By its attorneys,

/s/ Jennifer L. Chunias  
Anthony S. Fiotto (BBO #558089)  
Jennifer L. Chunias (BBO #644980)  
Karin M. Bell (BBO #654242)  
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DATED: October 31, 2005

**LOCAL RULE 7.1A(2) CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), counsel for Defendants conferred with counsel for Plaintiff and Defendant Robert Adler in a good faith effort. Counsel for Plaintiff and counsel for Defendant Robert Adler assent to the motion.

/s/ Jennifer L. Chunias

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